

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Anvik Corporation,

Plaintiff,

v.

IPS Alpha Technology, Ltd.,  
Toshiba Corporation,  
Toshiba America, Inc.,  
Toshiba America Consumer Products, L.L.C.,  
Matsushita Electric Industrial Co., Ltd.,  
Panasonic Corporation of North America,  
Hitachi, Ltd.,  
Hitachi Displays, Ltd.,  
Hitachi America, Ltd., and  
Hitachi Electronic Devices USA, Inc.,

Defendants-Counterclaimants.

Civil Action No.:

08 CV 4036 (SCR) (LMS)

**ANVIK'S REPLY TO THE HITACHI DEFENDANTS' COUNTERCLAIMS**

Plaintiff Anvik Corporation ("plaintiff" or "Anvik"), by and through its undersigned counsel, hereby replies to the Counterclaims of defendants Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices USA, Inc. (collectively, the "Hitachi Defendants"). The numbered paragraphs in the following Reply to Counterclaims correspond to the paragraph numbers of the Hitachi Defendants' Counterclaims.

**REPLY TO COUNTERCLAIMS**

116. Anvik denies the allegations of this paragraph except admits that the Counterclaims purport to arise under the U.S. Patent Laws and the Declaratory Judgment Act.

117. Anvik admits the allegations of this paragraph.

118. Anvik admits the allegations of this paragraph.

119. Anvik admits the allegations of this paragraph.

120. Anvik admits the allegations of this paragraph.

121. Anvik admits the allegations of this paragraph.

122. Anvik admits the allegations of this paragraph.

123. Anvik is without knowledge or information sufficient to form an accurate belief as to the truth of the allegations of this paragraph and therefore denies the same.

124. Anvik admits the allegations of this paragraph.

125. Anvik denies each and every allegation of this paragraph, including that U.S. Patent 4,934,257 is entitled "Scan and Repeat Resolution Projection Lithography System" and was issued on May 8, 1990. Anvik admits that U.S. Patent 4,924,257, entitled "Scan and Repeat Resolution Projection Lithography System," was issued on May 8, 1990.

126. Anvik denies each and every allegation of this paragraph, except Anvik admits that U.S. Patent 5,285,236, entitled "Large-Area, High Throughput, High Resolution Projection Imaging System," was issued on February 8, 1994.

127. Anvik denies each and every allegation of this paragraph, except Anvik admits that U.S. Patent 5,291,240, entitled "Nonlinearity-Compensated Large-Area Patterning System," was issued on March 1, 1994.

128. Anvik denies each and every allegation of this paragraph, except Anvik admits that U.S. Patent 5,721,606, entitled "Large-Area, High-Throughput, High-Resolution, Scan-And-Repeat, Projection Patterning System Employing Sub-Full Mask," was issued on February 24, 1998.

129. Anvik denies each and every allegation of this paragraph, except Anvik admits that U.S. Patent 5,897,986, entitled "Projection Patterning of Large Substrates Using Limited-Travel X-Y Stage," was issued on April 27, 1999.

130. Anvik admits the allegations of this paragraph.

131. Anvik admits the allegations of this paragraph.

132. Anvik denies the allegations of this paragraph.

**Reply To First Claim For Relief**

**(Declaratory Judgment of Noninfringement of U.S. Patent 4,924,257, U.S. Patent 5,285,236, U.S. Patent 5,291,240, U.S. Patent 5,721,606 and U.S. Patent 5,897,986)**

133. Anvik refers to and incorporates herein its responses to the foregoing paragraphs.

134. Anvik denies each and every allegation of this paragraph.

135. Anvik denies each and every allegation of this paragraph.

136. Anvik denies each and every allegation of this paragraph.

137. Anvik denies each and every allegation of this paragraph.

138. Anvik denies each and every allegation of this paragraph.

**Reply to Second Claim For Relief**

**(Declaratory Judgment of Invalidity and Unenforceability of U.S. Patent 4,924,257, U.S. Patent 5,285,236, U.S. Patent 5,291,240, U.S. Patent 5,721,606 and U.S. Patent 5,897,986)**

139. Anvik refers to and incorporates herein its responses to the foregoing paragraphs.

140. Anvik denies each and every allegation of this paragraph.

141. Anvik denies each and every allegation of this paragraph.

142. Anvik denies each and every allegation of this paragraph.

143. Anvik denies each and every allegation of this paragraph.

144. Anvik denies each and every allegation of this paragraph.

WHEREFORE, Anvik respectfully requests that the Court dismiss the Hitachi Defendants' counterclaims with prejudice.

**JURY DEMAND**

Anvik requests a trial by jury on all issues related to the Hitachi Defendants' Counterclaims.

Date: August 20, 2008

Respectfully submitted,

**By:** /s/ Joshua L. Raskin

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**ATTORNEYS FOR PLAINTIFF ANVIK CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing will be served electronically through the CM/ECF system to the registered participants at the time of filing and that paper copies shall be served by first class mail postage prepaid on all counsel who are not served electronically on August 20, 2008.

/s/ Joshua L. Raskin